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NOV 14 2022

KEVIN A. WEIMER, Clerk

By: N24 Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

JOHN DOE,

Movant.

V.

INTERAMERICAN CONSULTING, INC.,

Respondent.



1:22-MI-0072

Civil Action No.

Related to *PDV USA, Inc. v.*
Interamerican Consulting, Inc., No.
20-cv-3699 (S.D.N.Y.)

**MOTION FOR LEAVE TO FILE UNDER SEAL AND TO
PROCEED ANONYMOUSLY**

Movant John Doe moves for leave to file the following documents under seal:

- (1) Memorandum of Law in Support of Movant's Motion to Quash, including all exhibits thereto and the accompanying proposed order, filed on November 10, 2022;
- (2) the Memorandum of Law in Support of Movant's Motion to Seal, including the exhibit thereto; and (3) the Supplemental Motion to Quash and Memorandum of Law in Support, including all exhibits thereto and the accompanying proposed order.
- Movant further moves for leave to Proceed Anonymously. For the reasons stated in the Memorandum of Law, there is good cause to seal the requested documents and

allow Movant to proceed anonymously on the terms stated in the Memorandum of Law.

Dated: November 14, 2022

Respectfully submitted,

/s/ Robert L. Ashe III

Robert L. Ashe III

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Counsel for Movant

CERTIFICATE OF COMPLIANCE

The undersigned attorney hereby certified that the foregoing was prepared in accordance with N.D. Ga. L.R. 5.1, using Times New Roman font, 14 point.

/s/ Robert L. Ashe III

Ga. Bar No. 208077

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record for PDV USA and Interamerican on November 14, 2022 via e-mail and e-filing.

/s/ Robert L. Ashe III

Robert L. Ashe III